

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VIII

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DENVER, COLORADO 80202-2466

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Ref: 8HWM-FF

Mr. Frazer Lockhart
U.S. Department of Energy
Rocky Flats Office
P.O. Box 928
Golden, CO 80402-0928

RE: RFI/RI Work Plan for Operable Unit 3

Dear Mr. Lockhart:

In the draft Environmental Assessment for the Standley Lake Diversion Canal Project, The Department of Energy (DOE) acknowledged that erosion of the Standley Lake spillway channel may be a significant release mechanism for contaminated sediments from Standley Lake. Since there are both biotic and human receptors potentially affected by this release, a complete exposure pathway which has not been contemplated in the development of the RFI/RI program for Operable Unit 3 (OU 3) may exist.

DOE's identification of this exposure pathway dictates that characterization of the spillway sediments must be accomplished. Therefore, in accordance with Section VI.B. of the Interagency Agreement Statement of Work, DOE must submit a technical memorandum to EPA and the State which documents this data need, identifies associated data quality objectives, and amends the RFI/RI Work Plan for OU 3 to incorporate sampling of the spillway sediments. We believe that both grab and vertical profile samples are required. The analytical program must match the approved program for the Standley Lake sediments. The technical memorandum must be submitted to EPA and the State no later than May 29, 1992.

EPA notes that the Standley Lake project continues to proceed although characterization of the nature and extent of contamination in OU 3 has not yet been initiated. DOE bears the responsibility for ensuring that construction within OU 3 does not exacerbate the threat to human health or the environment by spreading the existing contamination, does not interfere with ongoing Comprehensive Environmental Response, Compensation, and Liability Act response activities, and does not result in increased response costs. A thorough quantitative assessment of risks associated with the Standley Lake Diversion Project must be completed before DOE allows construction to begin.

Should you wish to discuss these matters further, our point of contact for OU 3 is Bonnie Lavelle, (303) 294-1067.

Sincerely,

Martin Hestmark

Martin Hestmark, Manager
Rocky Flats Project

cc: Gary Baughman, CDH
Joe Schieffelin, CDH
James Hartman, DOE
Robert Birk, DOE
Michael Guillaume, EG&G
John Wegrzyn, USFWS